IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Applicant:	§ Art Unit: 2482
Louis Lippincott et al.	§
	§ Examiner: Chikaodili E. Anyikire
Serial No.: 10/750,075	§
	§ Conf. No.: 2083
Filed: December 31, 2003	§
	§ Docket: ITL.1703US
For: Motion Estimation Sum of all	§ P17498
Differences (SAD) Array Having	§
Reduced Semiconductor Die	§ Assignee: Intel Corporation
Area Consumption	§

Mail Stop **AF**
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

STATEMENT IN SUPPORT OF PRE-APPEAL BRIEF REQUEST FOR REVIEW

Dear Sir:

Pre-appeal review is requested because the limitation to adding an offset value to the reference block's uncompressed video data value and the search window block's uncompressed video data value is absent from any cited reference. The reference block and the search window blocks are from different frames (first and second frames in claim 1).

The final rejection contends that this limitation is shown in column 8, lines 39-50 of Lin. In Lin, the sum-of-the-absolute-differences is calculated for each macroblock by subtracting reduced-width pixel values. This generates the absolute value of the difference and then all the absolute values are summed. So Lin subtracts the reduced-width pixel values which can be represented as x minus the reduced-width pixel values. Then, you calculate the absolute value of the difference.

So now we have the absolute value of x minus the reduced-width pixel values. Then all these absolute values are summed. So we have a sum of the absolute values of x minus the reduced-width pixel value.
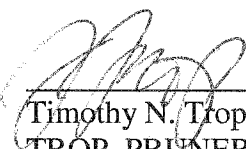
In contrast claim 1 calls for adding an offset to said reference macro block's uncompressed video data value and said search window macro block's video data value. Simply adding up all the absolute values of x minus the reduced-width pixel value can not mathematically equal the claimed operation. The claim calls for adding an offset to the reference block and search window block uncompressed video data values.

Simply subtracting the reduced-width pixel values from something, taking its absolute value and then adding all these absolute values together can never correspond to adding an offset to the original reduced-width pixel values. No offset could mathematically be argued to have been added to the reduced-width pixel values in Lin and therefore reconsideration would be appropriate.

Moreover, Lin's calculation is done entirely with blocks from the same frame not from two different frames as claimed. All four best-fit blocks must necessarily be in the current picture. *See* Lin column 8, lines 33-38. This is because you compare one block in the old frame to "multiple" blocks in the current frame to come up with four (not one) best-fit blocks which necessarily are from the current frame.

Respectfully submitted,

Date: <u>April 13, 2011</u>

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